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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LARIME TAYLOR, an individual,
 Plaintiff,
 vs.

Case. No.: 2:19-cv-00995-JCM-NJK

LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT, in its official capacity;
 CLARK COUNTY, a political subdivision
 of the State of Nevada; SHERIFF JOSEPH
 LOMBARDO, in his official capacity as
 Sheriff of the Las Vegas Metropolitan Police
 Department; OFFICER YOUNG, as an
 individual and in his capacity as a Las Vegas
 Metropolitan Police Department Officer;
 OFFICER KRAVITZ, as an individual and
 in his capacity as a Las Vegas Metropolitan
 Police Department Officer; OFFICER
 DARRELL LEE DAVIES, as an individual
 and in his official capacity as a Las Vegas
 Metropolitan Police Department Officer;
 OFFICER WESTON FERGUSON, as an
 individual and in his official capacity as a
 Las Vegas Metropolitan Police Department
 Officer; OFFICER THOMAS ALBRIGHT,
 as an individual and in his official capacity
 as a Las Vegas Metropolitan Police
 Department; OFFICER JANETTE
 GUTIERREZ, as an individual and in her
 official capacity as a Las Vegas Metropolitan
 Police Department Officer; OFFICER
 CLINT OWENSBY, as an individual and in
 his official capacity as a Las Vegas

**STIPULATION AND ORDER TO
 EXTEND THE DEADLINE FOR
 PLAINTIFF'S RESPONSE TO
 DEFENDANTS' MOTIONS TO
 DISMISS PLAINTIFF'S VERIFIED
 AMENDED COMPLAINT (ECF
 Nos. 21 and 22)**

(FIRST REQUEST)

Metropolitan Police Department; OFFICER ROBERT THORNE, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer; OFFICER JACOB BITTNER, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer; OFFICER GERARDO REYES, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer; OFFICER MORGAN MCCLARY, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer; OFFICER JAKE FREEMAN, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer; and OFFICER CHRISTOPHER LONGI, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer, Defendants.

Pursuant to LR IA 6-1, Plaintiff LARIME TAYLOR and Defendants LAS VEGAS METROPOLITAN POLICE DEPARTMENT, JOSEPH LOMBARDO, OFFICER YOUNG, OFFICER MATTHEW KRAVITZ, OFFICER DARRELL LEE DAVIES, OFFICER WESTON FERGUSON, OFFICER THOMAS ALBRIGHT, OFFICER JANETTE GUTIERREZ, OFFICER CLINT OWENSBY, OFFICER ROBERT THORNE, OFFICER JACOB BITTNER, OFFICER GERARDO REYES, OFFICER MORGAN MCCLARY, OFFICER JAKE FREEMAN, and OFFICER CHRISTOPHER LONGI (“LVMPD Defendants”) and Defendants CLARK COUNTY and CLARK COUNTY DEPARTMENT OF PUBLIC WORKS, by and through their respective counsel, hereby stipulate and request that this Court extend the deadline to file the Plaintiff’s Responses to Defendants’ Motions to Dismiss (ECF Nos. 21 and 22) filed on August 29, 2019 by an additional thirty (30) days, extending the deadline from September 12, 2019 to October 11, 2019. This is the first stipulation for extension of time for Plaintiff to file his Responses.

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1 The parties also hereby stipulate and agree that Defendants may have an additional
2 seven (7) days to file their respective Replies in Support of their Motions to Dismiss.
3 Defendants' proposed new Reply deadline would be October 25, 2019.

4 This Request for an extension of time is not sought for any improper purpose or
5 other purpose of delay. This request for extension is based upon the following:

6 Counsel for Plaintiff initiated this request due to numerous competing deadlines,
7 including a court-ordered settlement conference on September 12, 2019 in *Thomas Walker,*
8 *et al. v. City of North Las Vegas, et al.*, U.S. Dist. Court Case No. 2:14-cv-01475; and an
9 evidentiary hearing on September 27, 2019 in *Hickman v. State*, Eighth Judicial Dist. Court
10 Case No. C-12-278699-1. Additionally, the undersigned will be out of the jurisdiction from
11 September 14, 2019 through September 21, 2019. Moreover, counsel Margaret A. McLetchie
12 will be out of the jurisdiction on September 19, 2019 through September 20, 2019 for work
13 on a federal case in the Central District of California. Counsel for Plaintiff also has numerous
14 deadlines in other state court matters which interfere with the preparation of the Responses
15 in this matter.

16 WHEREFORE, the parties respectfully request that this Court extend the deadline
17 to file Plaintiff's Response to Defendants' Motions to Dismiss (ECF Nos. 21 and 22)
18 Plaintiff's Verified Amended Complaint (ECF No.12-1) filed on August 29, 2019 to up to
19 and including October 11, 2019. Defendants' Replies shall also be granted an additional week
20 extension with their new deadline being October 25, 2019.

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IT IS SO STIPULATED.

DATED this the 10th day of September, 2019. DATED this the 10th day of September, 2019.

MARQUIS AURBACH COFFING

DISTRICT ATTORNEY'S OFFICE

/s/ Jackie V. Nichols

/s/ Joel K. Browning

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DATED this the 10th day of September, 2019.

MCLETCHIE LAW

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Attorneys for Plaintiff Larime Taylor

ORDER

IT IS SO ORDERED.


HONORABLE JUDGE JAMES C. MAHAN
U.S. DISTRICT COURT JUDGE

September 10, 2019
DATED: _____